

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

CENTRAL ILLINOIS LIGHT COMPANY)	
d/b/a Ameren CILCO)	
)	Docket No. 05-0160
Proposal to implement a competitive)	
procurement process by establishing)	
Rider CCP, Rider PPO-MVM, Rider)	
TS-CPP and revising Rider PPO-MI)	

CENTRAL PUBLIC SERVICE COMPANY)	
d/b/a Ameren CIPS)	
)	Docket No. 05-0161
Proposal to implement a competitive)	
procurement process by establishing)	
Rider CCP, Rider PPO-MVM, Rider)	
TS-CPP and revising Rider PPO-MI)	

ILLINOIS POWER COMPANY)	
d/b/a Ameren IP)	
)	Docket No. 05-0162
Proposal to implement a competitive)	
procurement process by establishing)	
Rider CCP, Rider PPO-MVM, Rider)	
TS-CPP and revising Rider PPO-MI)	

**LOCALS 15, 51 AND 702
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO'S
RESPONSE TO THE MOTION TO RESCHEDULE AND CLARIFY THE
SCOPE OF THE ORAL ARGUMENT BY THE PEOPLE OF THE STATE OF ILLINOIS**

Come now, Locals 15, 51 and 702, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW") and in response to the Motion to Reschedule the Oral Argument in the above-mentioned case pursuant to Ill. Admin Code Section 200.190 (a) and to Clarify the

Scope of Oral Argument in advance of the actual day the Argument is scheduled by the People of the State of Illinois (the “People”) state as follows:

1. The People’s Motion is grounded on two major concerns. As is immediately obvious by the sheer number of participants in these cases, these proposed auctions have sparked intense interest by many players and those who want to be players in the Illinois electric supply market.
2. Any decision the Commission makes in these cases will have a dramatic effect on the distribution and delivery of electricity to millions of customers in Illinois, only a few of whom have options sources of supply for their electricity and the vast majority of whom enjoy no such luxury or privilege.
3. No matter how the Commission decides these cases, its decisions will have a dramatic impact on how the Commission regulates the sale of energy, if it continues to do so much at all in the future, in the interest of Illinois consumers.
4. Before the Commission crosses the Rubicon divesting itself of even more regulatory authority, it should hear the best arguments about what statutory authority, if any, it has to take such a big leap.
5. As the People’s Motion makes clear, given the eleventh hour announcement by the Commission to schedule oral argument in these case, few of the attorneys for those parties who have one view of how Section 16-103(c) of the Public Utilities Act ought to be interpreted, are or can reasonably be present for the scheduled July 5, 2005 oral argument. Their unavailability is

through no fault of their own making; they had no idea when they left Illinois on various trips that the Commission would suddenly announce oral argument on these matters.

6. Like attorneys for the People, the attorney for the IBEW, in addition to responding to the Petitions for Interlocutory Review, has been engaged in briefing other Commission dockets (04-0111 and 05-0257) in the last few days and dealing with a new Department of Labor reporting requirement with a mid-July deadline that has an impact on all of his firm's clients as well as their officers and employees.
7. As a consequence the IBEW's attorney has not yet had time to review the many Responses to the Petitions for Interlocutory Review and believes that his clients as well as the People et al. should be given a reasonable time to review positions taken by those who favor the proposed auction process in order to be prepared to respond to the issues they and the Commissioners might raise in oral argument.
8. Finally, for all of the reasons stated in the People's Motion, the Commission should make clear that the only issue it wishes to hear about in the oral argument is the scope of Section 16-103(c) of the Public Utilities Act.
9. Because the Commission has pushed back the dates for holding hearings in these auction cases to the end of August, no party or intervenor will be adversely impacted by a decision to reschedule oral argument to July 14, 2005.

WHEREFORE, the IBEW respectfully requests that the Commission grant the People's Motion to Reschedule and to Clarify the Scope of Oral Argument.

Respectfully submitted,

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NOTICE OF FILING

Please take note that on July 1, 2005, I caused to be filed with the Chief Clerk of the Illinois Commerce Commission, Elizabeth Rolando, 527 E. Capitol Avenue, Springfield, IL 62701 via e-docket the enclosed Response to Reschedule and Clarify the Scope of Oral Argument by the People of the State of Illinois in the above-captioned proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Please take note that on July 1, 2005, I, Christopher T. Hexter, hereby certify that I did electronically file with the Illinois Commerce Commission the foregoing Response and electronically served the same upon the persons identified on the attached service list.

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